

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:) CHAPTER 13
LEE SELLERS)
MADALYN SELLERS) CASE NO. 16-31364-DHW-13
Debtor(s).)

OBJECTION TO CONFIRMATION

Now comes MONTGOMERY CREDIT CORPORATION, by its attorneys, Chambless Math ❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof states as follows:

1. The debtor has failed to provide evidence of insurance coverage as required 11 U.S.C. Section 1326(a)(4) on the collateral securing the loans of the movant, to wit: 1999 GMC 1500 and 2004 CHRYSLER SEBRING.

2. The plan fails to provide for the secured claim of this creditor as required by 11 U.S.C. Section 1325(a)(5).

WHEREFORE, MONTGOMERY CREDIT CORPORATION, prays for an Order denying confirmation along with such further relief as the Court may deem proper.

MONTGOMERY CREDIT CORPORATION

By: /s/ Leonard N. Math

Of Counsel:
Chambless Math ❖ Carr, P.C.
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this August 3, 2016.

CURTIS C. REDING
Chapter 13 Trustee
P.O. BOX 173
MONTGOMERY AL 36101

RICHARD D SHINBAUM
SHINBAUM & CAMPBELL
P.O. BOX 201
MONTGOMERY AL 36101

LEE SELLERS
MADALYN SELLERS
3501 KINGS CLIFF RD
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/s/ Leonard N. Math